IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE

ANDREW JOSTEN LOVINGOOD)
Plaintiff,))) Docket No.: 3:19-CV-00009
v.)
)
BILL JOHNSON,)
DERRICK GRAVES, and)
MONROE COUNTY, TENNESSEE)
)
Defendants.)

JOINT MOTION TO CONTINUE TRIAL DATE

COMES NOW, the plaintiff along with counsel for the defendants and respectfully requests by Joint Motion that this Honorable Court continue the trial in this matter. In support the parties submit the following:

- 1. This matter is currently set for trial on March 16, 2021
- 2. The parties have engaged in discovery and as a result Summary Judgment Motions have been filed [See Doc.23, 25, and 48].
- 3. Currently pending before this Honorable Court is Defendant, Monroe Counties, Motion for Summary Judgment [Doc. 48].
- 4. Counsel for Plaintiff currently has a 7-day trial scheduled in the Eastern District Court of Tennessee (Chattanooga Venue) which pre-dates the filing of this complaint scheduled for March 8, 2021 Adams v. Blount County et al Case No3:17-CV-00313.
 - 5. The matter referenced in Paragraph 4 above, was previously assigned to the Honorable

Pamela Reeves, then re-assigned to the Honorable Curtis Collier (Chattanooga) and has recently been re-assigned to the Honorable Katherine Crytzer.

- 6. Counsel for Plaintiff will not be able to participate and or prepare for the Trial of Lovingood v. Monroe County et al while participating in the trial of Adams v. Blount County et al.
- 7. Given the Covid-19 exaggerated case numbers and the uncertainty of Jury Trials all counsel would respectfully request that this Honorable Court schedule a trial date in the future, and consider scheduling a status conference before confirming a trial date to consider the effects of the Covid-19 Pandemic and its impact on scheduling.

RESPECTFULLY SUBMITTED, this the 12th day of January, 2021.

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CERTIFICATE OF SERVICE

I hereby certify that, a copy of the foregoing Motion to Extend Time was transmitted for service via Pacer and this Court's Electronic Court Filing System to counsel of record for all parties.

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By:

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